

**IN THE UNITED STATES DISTRICT COURT FOR THE**  
**SOUTHERN DISTRICT OF NEW YORK**

<b>AMERICAN INSURANCE COMPANY</b>	:	
<b>Plaintiff</b>	:	
<b>v.</b>	:	
<b>CORN ASSOCIATES LLC;</b>	:	<b>CASE NUMBER: 1:07-cv-8604</b>
<b>THE FRANKLIN TOWER CONDOMINIUM</b>	:	
<b>KATZ METAL FABRICATORS INC.</b>	:	<b>JOINT DISCOVERY PLAN</b>
<b>SAMCO PLUMBING, INC.</b>	:	
<b>Defendants.</b>	:	

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Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and this Court's Order for Initial Pretrial Conference dated November 7, 2007, the parties to this action, having conferred and agreed, submit the following proposed discovery plan:

**1. Automatic Disclosures**

To be served by all parties on or before April 1, 2008.

**2. Discovery Scope and Schedule**

Fact discovery of all parties on the events leading to the loss and the amount of damages shall be concluded on or before October 1, 2008.

Plaintiffs shall disclose their experts and provide expert reports on or before January 15, 2009. Defendants shall disclose their experts and provide expert reports on or before February 15, 2009.

Motions for summary judgment shall be filed on or before April 1, 2009.

**3. Electronic Information**

No issues identified to date.

**4. Privilege Issues**

No issues identified.

**5. Discovery Limits**

The parties agree to observe the limitations on interrogatories set forth in local rule 33.3.

**6. Other Proposed Orders**

None identified to date.

Respectfully submitted,

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